

Appl. No. 09/774,976  
Amdt. Dated October 6, 2005  
Reply to Office action of July 13, 2005

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### Remarks/Arguments

Claims 1 through 22 stand rejected on the newly cited art, including Bahl et al paper "User Location and Tracking in an In-Building Radio Network" (hereinafter Bahl), Bolliger et al patent 5,969,679 (hereinafter Bolliger) and Shuba et al patent 6,724,733 (hereinafter Schuba). In response thereto applicants have cancelled claims 1-22 and are presenting in their stead new claims 23 and 24.

Applicants' invention is directed to the problem of determining a geographic region in which a host is located, the host being in a packet switched wireline network, identified in applicants' specification as the Internet. This is not the problem to which the cited art is directed. Specifically, Bahl is directed to locating mobile computing users in a wireless network. Bolliger is also directed to wireless networks and specifically to determining if a wireless station is located within a prescribed region. Schuba, on the other hand, is directed to determining distances between locations in a network.

Accordingly, applicants' new claim 23 specifically recites that the claimed invention determines the geographical region in which is located a specific host in a wireline Internet network and that the method involves first and second sets of information with the steps of determining mean vectors of the first sets of information, determining Mahalanobis distances of the determined mean vectors from the second sets of information, selecting the one of the determined mean vectors with the shortest Mahalanobis distance from the second sets of information, and then determining the region for the specific host based on the selected mean vector with the shortest Mahalanobis distance.

The Examiner has noted that applicants are not the inventors of or the first to utilize Mahalanobis distances. However, applicants submit that their specific use of the shortest Mahalanobis distance to provide the identification of a geographic region for a host in a packet switched wireline network is novel, unobvious, and patentable.

New dependent claim 24 adds to the method recited in its parent claim 23 the step of determining variance matrices of the first sets of information associated with the selected other hosts, as discussed at page 14, line 11 et seq and identified as step 535 of Fig. 5 of applicants' specification. Such a step in the recited combination for determining a geographic region in which is located a host in a wireline Internet network is neither disclosed nor suggested in the prior art.


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Accordingly, favorable consideration and allowance of new claims 23 and 24 and passage of this application to issue are respectfully requested.

Respectfully submitted,

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